



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Martin Suuberg
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MEETING AGENDA

Phase III for former Aerovox Facility
December 8, 2016, 10:00 am

1. Overall General/Technical Comments

- a. Phase II Deficiencies
- b. Mass Flux Calculations
 - Assumption of non-contaminated areas
 - Delineation of northern boundary of plume in deep bedrock aquifer
 - Lack of adequate piezometric head data for deep bedrock aquifer to determine mass flux
 - Variability in hydraulic conductivity of bedrock aquifer
 - Thickness of plume in deep and shallow and bedrock aquifer
 - Mass flux in overburden
 - Mass flux of PCB/TCE mixture
- c. Groundwater Modeling
 - Boundary conditions, pavement and recharge
 - Insufficient slug test data where PRB is proposed
 - Effect of excavation of UV-17 and MIP-23 areas on groundwater flow
- d. Identification, Evaluation, and Scoring of Remedial Alternatives
 - On-Site consolidation options under OU1 and OU3
 - On-Site consolidation as alternative for OU3A
 - Evaluation of costs
 - Consideration of long-term environmental protection and safety
 - Scoring approach
- e. Other

2. Operable Units – MassDEP Determinations Regarding the Proposed Alternatives

- a. OU1-1: Titleist property – excavation, soil cap, and AUL: Conditional Approval
 - EPA's additional data
 - AVX meeting with Titleist regarding remedial alternative
- b. OU2-1: Precix property – MNA and AUL: Approval
- c. OU3A-3: Aerovox property overburden soil – asphalt cap and engineered barrier: Notice of Deficiency
 - No discussion of remaining NAPL after IRA excavations
 - Cost discrepancies between text and Appendix D
 - Long term sustainability of option is not discussed (rising sea levels, severe storm events)
 - On-site consolidation was not considered for this portion of the operable unit
 - No discussion of on-Site consolidation on the upland portions of the Site
 - EPA's harbor dredging is not discussed as it relates to the proposed alternative
 - Reconsideration of non-pecuniary factors in light of comments by the City
- d. OU3B-4: Aerovox property shallow and deep overburden groundwater – vertical barrier wall, PRB, in situ treatment of soil hot spots: Denial
 - Cost discrepancies between text and Appendix D
 - Mass flux calculations, coupled with groundwater modeling, does not support the conclusion that PCBs in groundwater do not need to be controlled
 - PCBs are not adequately treated/controlled with a Permeable Reactive Barrier (PRB)
 - No examples of successful remediation using a PRB for PCB remediation or along a tidally influenced shore line were provided
 - No discussion of mobilization of PCBs due to co-located TCE contamination
 - EPA's harbor dredging is not discussed as it relates to the proposed alternative
- e. OU4-1: Aerovox bedrock groundwater – ISCO (sodium permanganate for TCE and alkaline persulfate for PCBs and TCE) of hot spots and MNA: Notice of Deficiency
 - Technical issues with proposed remedial option
 - Discussion of bedrock groundwater hydraulic control/containment in Section 4.1.2.1 not carried through
 - Additional characterization needed to determine the lateral extent of hot spots in bedrock

3. Next Steps